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NAS WHITING FIELD
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LETTER AND COMMENTS FROM ALABAMA DEPARTMENT OF ENVIRONMENTAL
MANAGEMENT REGARDING JP-5 RISK EVALUATION SITE 24B FIRE FIGHTER TRAINING
AREA BARIN NAS WHITING FIELD FL
11/1/1995
ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

ADEM**ALABAMA
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**Fob James, Jr.
GovernorJames W. Warr
Acting Director
~~XXXXXXXXXXXX~~
Director

November 1, 1995

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Southern Division
Naval Facilities Engineering Command
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North Charleston, SC 29419-9010RE: JP-5 Risk Evaluation
Site 24B, Abandoned Firefighting Training Area
OLF Barin, Foley, Alabama

Dear Mr. Adams:

After review of the additional risk evaluation for JP-5 at Site 24B, we cannot concur with an NFA based on the following.

- The use of the RfD value for TPH assumes that during burning of JP-5 no polycyclic aromatic hydrocarbons (PAHs) will be produced and does not account for the presence of other carcinogens. The presence of carcinogens would require the use of cancer slope factors (CSFs), which usually are more restrictive.
- We suggest a more complete analysis of the burn pit area to characterize the presence of carcinogens. It would be acceptable to have one sample that would be representative of the burn pit. The sample should be analyzed for the following; target compound list (TCL) volatile organic compounds (VOCs); (PAHs); total petroleum hydrocarbons (TPHs); and, target analyte list (TAL) inorganic parameters. These analyses will determine the method by which risks should be calculated, either based on RfDs or CSFs.
- There is some concern of the integrity of the polyethylene lined pit. Morrison Knudsen (MK) noted in their Work Plan for the removal of the FFTA that standing surface water was observed at the FFTA while taking samples on 2/16/95. MK stated this is an indication that the underlying plastic liner is most likely intact; otherwise, the water would quickly drain from the FFTA because of sandy soils underlying the pit. On 5/1/95 during a sampling event it was noted that the pit was free of any standing surface water. Precipitation data gathered at Mobile, Ala., shows more than 16 inches of rain fall between the dates above.



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Nowhere in the State of Alabama is lake surface evaporation rate more than the precipitation rate. For these reasons it is possible that the liner could be degraded or torn. Please provide us with your plans to determine the integrity of the pit liner.

If you have any questions, please contact me at 334-213-4322.

Sincerely,



David Thompson
Special Projects

cc. Kathy Hodak, ABB